Occidental Chemical Corporation Health, Environment, Safety & Security Dept.



March 2, 2016

CERTIFIED MAIL 7013 2250 0001 0126 5940 Return Receipt Requested

Mr. Bradley Roberts AWMD/WRAP/KNRP Environmental Protection Agency, Region VII 11201 Renner Blvd Lenexa, Kansas 66219

Dear Mr. Roberts:

RE: FOLLOW-UP TO 10/08/2015 SODIUM DICHROMATE SPILL AND NITRIC OXIDE RELEASE, NRC #1130443 AND #1130578

As requested please see the attached tabulated analytical and associated map for the soil samples that were taken as part of the clean-up of the sodium dichromate spill that occurred on October 8, 2015. The table represents 34 samples that were taken in the ditch adjacent to the facility and the samples surrounding the sodium chlorite plant inside the fence line. The ditch samples were compared to the residential standard of 33.6 ppm and the on-site samples within the fence line were compared to the industrial standard of 111 ppm. The map is of the sodium chlorite plant itself and the entire length of the ditch. The numbers on the map directly correlate with the soil samples. In the smaller areas where several samples were taken, the correlating numbers are grouped together.

We are submitting additional response to satisfy requirements in the Superfund Amendments and Reauthorization Act (SARA). Specifically, Section 304 of SARA requires a written follow-up emergency notice be issued to the Local Emergency Planning Committee and the Commission of Emergency Planning and Response as soon as practical after a release of a reportable quantity (RQ) of a substance listed in 40 CFR 355.40(b). The information in this letter is presented in a format using definitions and standards that do not constitute binding legal standards for the purposes of civil litigation.

If you have questions regarding the report, please call me at (316)529-7204.

Sincerely,

Lisa R. Thurman Environmental Engineer

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Tabulated Analytical Data for Soil Samples



Sample ID on Map	Sample Area	Sample Location	Date Sampled	Date Analyzed	Chromium, TCLP mg/L or mg/kg	Industrial Standard	Resident Standard
1	Ditch	Surface -south culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
2	Ditch	Surface - north culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
3	Ditch	Surface - 50ft from north culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
4	Ditch	Surface - 100 ft from north culvert	10/12/2015	10/14/2015	0.24 mg/L	111 mg/kg	33.6 mg/kg
5	Ditch	Surface - 150 ft from north culvert	10/12/2015	10/14/2015	0.35 mg/L	111 mg/kg	33.6 mg/kg
6	Ditch	Surface - 200 ft from north culvert	10/12/2015	10/14/2015	0.95 mg/L	111 mg/kg	33.6 mg/kg
7	Ditch	6-8" depth - 200 ft from north culvert	10/12/2015	10/14/2015	22 mg/L	111 mg/kg	33.6 mg/kg
8	Ditch	4-6" depth - 275 ft from north culvert	10/12/2015	10/14/2015	67.1 mg/L	111 mg/kg	33.6 mg/kg
9	Ditch	6-10" depth - 275 ft from north culvert	10/12/2015	10/14/2015	78.1 mg/L	111 mg/kg	33.6 mg/kg
10	Ditch	6-10" depth - 375 ft from north culvert	10/12/2015	10/14/2015	36 mg/L	111 mg/kg	33.6 mg/kg
11	Ditch	6-10" depth - 475 ft from north culvert	10/12/2015	10/14/2015	40 mg/L	111 mg/kg	33.6 mg/kg
12	Ditch	Surface - 575 ft from north culvert	10/12/2015	10/14/2015	46 mg/L	111 mg/kg	33.6 mg/kg
13	Ditch	6-10" depth - 575 ft from north culvert	10/12/2015	10/14/2015	25 mg/L	111 mg/kg	33.6 mg/kg
14	Ditch	Surface - 675 ft from north culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
15	Ditch	Surface - 775 ft from north culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
16	Ditch	Surface - 875 ft from north culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
17	Ditch	Surface - 975 ft from north culvert	10/12/2015	10/14/2015	ND(0.10)	111 mg/kg	33.6 mg/kg
18	Ditch	200 ft from north culvert	11/16/2015	11/20/2016	36 mg/kg	111 mg/kg	33.6 mg/kg
19	Ditch	Middle Area- (275 ft from north culvert)	11/16/2015	11/20/2016	27 mg/kg	111 mg/kg	33.6 mg/kg
20	Ditch	475 ft from north culvert	11/16/2015	11/20/2016	20 mg/kg	111 mg/kg	33.6 mg/kg
21	Transformer Yd	Middle of East Side of Yard	10/12/2015	10/24/2015	16.5 mg/kg	111 mg/kg	33.6 mg/kg
22	Transformer Yd	SE Corner of Yard	10/12/2015	10/27/2015	25 mg/kg	111 mg/kg	33.6 mg/kg
23	Transformer Yd	NE Corner of Yard	10/12/2015	10/24/2015	19.3 mg/kg	111 mg/kg	33.6 mg/kg
24	Transformer Yd	NW Corner of Yard	10/12/2015	10/27/2015	38 mg/kg	111 mg/kg	33.6 mg/kg
25	Transformer Yd	South Side of Diked Area W Side	10/12/2015	10/24/2015	87.4 mg/kg	111 mg/kg	33.6 mg/kg
26	Transformer Yd	SW Corner of Transformer Yard	10/12/2015	10/27/2015	62.9 mg/kg	111 mg/kg	33.6 mg/kg
27	Inside Plant	South of MCC Building	11/11/2015	11/24/2015	17 mg/kg	111 mg/kg	33.6 mg/kg
28	Inside Plant	SW Corner of Plant	11/11/2015	11/24/2015	23 mg/kg	111 mg/kg	33.6 mg/kg
29	Inside Plant	North Side of Transformer Yard	11/11/2015	11/20/2015	36.5 mg/kg	111 mg/kg	33.6 mg/kg
30	Inside Plant	North Side of Control Room	11/11/2015	11/21/2015	13 mg/kg	111 mg/kg	33.6 mg/kg
31	Inside Plant	Corner of Warehouse & Driveway	11/11/2015	11/20/2015	19.7 mg/kg	111 mg/kg	33.6 mg/kg
32	Inside Plant	NW Corner of Plant	11/11/2015	11/24/2015	169 mg/kg	111 mg/kg	33.6 mg/kg
33	Inside Plant	At Corner of Sidewalk & Warehouse	12/09/2015	12/11/2015	21 mg/kg	111 mg/kg	33.6 mg/kg
34	Inside Plant	8ft from Corner of Warehouse	12/09/2015	12/11/2015	27 mg/kg	111 mg/kg	33.6 mg/kg

^{*} Red indicates exceedence compared to standard used for the area

^{*} Blue highlight indicates the standard that is used for the designated area

Map of Sodium Chlorite Plant & Ditch Samples



